

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

<b>FlavaWorks Entertainment, Inc.,</b>	)	
<b>Blatino Media, Inc.,</b>	)	
<b>Plaintiffs,</b>	)	<b>Case No. :</b>
<b>1:24-cv-09725</b>	)	
	)	
	)	<b>Hon. Franklin U. Valderrama</b>
<b>v.</b>	)	
	)	<b>JURY TRIAL DEMANDED</b>
<b>John Doe 1, et al</b>	)	
<b>Defendants.</b>	)	

**PLAINTIFFS' RULE 4(m) STATUS REPORT AND REQUEST FOR ADDITIONAL TIME TO  
SERVE DEFENDANTS**

NOW COME Plaintiffs, FlavaWorks Entertainment, Inc. and Blatino Media, Inc. ("Plaintiffs"), by and through undersigned counsel, and pursuant to Federal Rule of Civil Procedure 4(m), submit this status report and request for additional time to complete service on the remaining defendants.

Plaintiffs filed this action initially naming multiple defendants as "John Does" because their identities could not be ascertained at the time of filing. On June 17, 2025, Plaintiffs filed a motion to amend their Complaint and convert certain John Doe defendants into named defendants upon learning their identities through discovery, including subpoena responses from third-party service providers.

On June 27, 2025, Plaintiffs filed their First Amended Complaint naming the following defendants: Joshua Cofield, Joe Wija, John Chris Lorino, Michael Shane Gordon, Davon Applewhite, Richard Lindner, Rodney Block, Gabriel Johnson, David Tam, and Kevin Mediana. Summonses have been issued for these defendants and Plaintiffs are currently in the process of effectuating service.

Plaintiffs continue to pursue discovery to identify the remaining John Doe defendants. Plaintiffs are actively working with Internet service providers, specifically Yahoo and Google, to obtain full compliance with subpoenas that were issued for account and subscriber information. Some subpoena responses to date have been incomplete, lacking the necessary identifying details required to name and serve these remaining defendants. Plaintiffs anticipate that upon receiving this additional information, they will promptly amend the Complaint to name these defendants and serve them with summonses.

Because these defendants' identities are uniquely within the possession of third parties and Plaintiffs have diligently pursued this discovery, Plaintiffs respectfully request that the Court extend the time to serve under Rule 4(m) to allow Plaintiffs to complete their ongoing efforts to identify and serve all defendants properly. Plaintiffs are also prepared to move to dismiss any defendants who remain unidentified by that date, without prejudice, to preserve their right to refile if necessary.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court grant an extension of the service deadline under Rule 4(m) to permit Plaintiffs to continue their diligent efforts to identify and serve the remaining defendants, and for such other relief as the Court deems just and appropriate.

Dated: July 1, 2025

Respectfully Submitted,  
FlavaWorks Entertainment, Inc.  
Blatino Media, Inc.  
*/s/Hameed Odunewu*  
Attorney For Plaintiffs

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